

**Kristi Cahoon Kelly**

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**From:** Kathryn Scott [Kathryn.Scott@nelsonmullins.com] on behalf of George Kostel [George.Kostel@nelsonmullins.com]  
**Sent:** Tuesday, February 07, 2012 10:16 AM  
**To:** lenbennett@clalegal.com  
**Cc:** Kristi Cahoon Kelly; Scott Surovell  
**Subject:** Berrios v. Experian Information Systems, Inc., et al.  
**Attachments:** 2 7 12 letter to L Bennett.pdf

Attached is correspondence from George Kostel regarding the above referenced case.

*Kathryn Ann Scott*

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February 7, 2012

## VIA ELECTRONIC AND REGULAR MAIL

Leonard A. Bennett, Esq.  
Consumer Litigation Associates  
753 J Clyde Morris Boulevard  
Suite 1A  
Newport News, VA 23601

Re: *Sandra J. Berrios v. Experian Information Solutions, Inc., et al.*  
U.S. District Court for the Eastern District of Virginia;  
Civil Action No. 1:11-cv-01130-AJT-IDD

Dear Len:

I expected to hear from you at 12 noon yesterday as we had scheduled to discuss the discovery concerns you alluded to on Friday. In preparation for the "meet and confer" conference I had planned to have with you today, I looked over your client's discovery requests, our objections, and Flagstar's responses served on January 23, 2012.<sup>1</sup> I wanted to write to confirm that we will produce, subject to an agreed protective order, a number of the documents you requested.

1. If we can work through the terms of an agreed protective order I will provide you with documents responsive to your requests for policies and training materials (Request Nos. 7, 10, 11 & 21) no later than Friday.
2. Upon entry of the protective order, I will also supply answers to the interrogatories you have asked regarding training and compliance procedures. We will also provide the necessary systems information to understand the notes

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<sup>1</sup> You indicated no responses were served. That is mistaken. I had understood this to mean you were not satisfied with the responses, but now believe you may not have received them. Everything was served on you and Ms. Kelly on the date due.

Leonard A. Bennett, Esq.

February 7, 2012

Page 2

on the account. I believe these consist of Interrogatory Nos. 1, 2, 7, 8, 10 & 14. I hope to have those supplemental answers prepared by Friday as well.

3. We will also expound on our response to Interrogatory Nos. 4 & 16 pertaining to our investigation of Plaintiff's account and any manuals that applied. Interrogatory Nos. 6, 12 & 20 are related documents (Document Requests Nos. 21 & 23).

If there are any other issues you wanted to address, I look forward to rescheduling our "meet and confer" that we had planned to have yesterday. I can be available any day except Thursday after 10:00 a.m. and Friday before 1:00 p.m. I will endeavor to prepare in advance of any conference if you will let me know what topics you would like to address.

I will write separately regarding the two deposition notices from you that I received in yesterday's mail.

Very truly yours,



George E. Kostel

GEK:kas

cc: Kristi Cahoon Kelly, Esq. (e-mail only)  
Scott Surovell, Esq. (e-mail only)